

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
DIVISION

Shawn Williams, 100045
)
)
)
)
)

(Enter above the full name of the
Plaintiff(s) in this action. Include prison
registration number(s).)

v.

Bobby Garrett
)
CITY OF St Louis Metropolitan Police Dept
)
Board of Police Commissioners
)
)
)
)

Case No. _____
(To be assigned by Clerk)

(Jury Demanded)

(Enter above the full name of ALL Defend-
ant(s) in this action. Fed. R. Civ. P. 10(a)
requires that the caption of the complaint
include the names of all the parties. Merely
listing one party and "et al." is insufficient.
Please attach additional sheets if necessary.)

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

I. PLACE OF PRESENT CONFINEMENT:

City of St Louis J. Center for Justice St Louis mo 63102

II. PREVIOUS CIVIL ACTIONS:

- A. Have you brought any other civil actions in state or federal court dealing with the same facts involved in this action or otherwise relating to your confinement?

YES []

NO [✓]

- B. If your answer to "A" is YES, describe the action(s) in the space below. If there is more than one action, you must describe the additional action(s) on a separate piece of paper, using the same format as below.

1. Parties to previous civil action:

Plaintiff(s): NA

NA

Defendant(s): NA

NA

2. Court where filed: NA

3. Docket or case number: NA

4. Name of Judge: NA

5. Basic claim made: NA

NA

NA

6. Present disposition (Is the case still pending? Is it closed? If closed, was it appealed?):

NA

III. GRIEVANCE PROCEDURES:

- A. Is there a prisoner grievance procedure at the institution in which you are incarcerated?

YES [☒] NO [☐]

- B. Have you presented this grievance system the facts which are at issue in this complaint?

YES [☐] NO [☒]

C. If your answer to "B" is YES, what steps did you take: None

NA

NA

D. If your answer to "B" is NO, explain why you have not used the grievance system:

Cause of Circumstances The Grievance

Protocol Wasnt Designed for Fake Imprisonment.

IV. PARTIES TO THIS ACTION:

A. Plaintiff(s)

1. Name of Plaintiff: Shawn Williams

2. Plaintiff's address: St Louis J. Center and S. Tucker ^{St Louis MO} 63102

3. Registration number: W00045

4. Additional Plaintiff(s) and address(es): None

NA

NA

B. Defendant(s)

1. Name of Defendant: BOBBY GARRETT

2. Defendant's address: Not Known

3. Defendant's employer and job title: City of St Louis Metropolitan
Police Det. Crime Suppression Unit

4. Additional Defendant(s) and address(es): City of St Louis metro-

Police Board of Police Commissioners - St Louis -
Metropolitan Police Department ~~Post Remand Unit~~ 1200 Jackson Ave St Louis MO 63102

V. COUNSEL

A. Do you have an attorney to represent you in this action?

YES []

NO [☒]

B. If your answer to "A" is NO, have you made an effort to contact an attorney to represent you in this matter?

YES []

NO [☒]

C. If your answer to "B" is YES, state the name(s) and address(es) of the attorneys you contacted and the results of those efforts:

NA

NA

NA

D. If your answer to "B" is NO, explain why you have not made such efforts:

Cause I Don't No Where to look for a Civil
Lawyer But I'm the Financie to take my Case Pro Bono

E. Have you previously been represented by counsel in a civil action in this Court?

YES []

NO [☒]

F. If your answer to "E" is YES, state the attorney's name and address:

NA

NA

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

SHAWN WILLIAMS

Plaintiff,

VS. BOBBY GARRETT, CITY OF ST. LOUIS

METROPOLITAN POLICE DEPT.
BOARD OF POLICE COMMISSIONERS
Defendant.

Cause No. _____

Division No. _____

COMPLAINT

COMES NOW the complainant who being duly sworn according to law deposes and charges:

COUNT 01:

That BOBBY GARRETT in violation of V.A.M.S. § 575.020. 112 committed the class D felony of Attempt to Conceal a Felony, punishable upon conviction under V.A.M.S. § 55B.011.140. On about May 21, 2007 in the City of St. Louis, State of Missouri in the 4200 block of Evans a warrantless arrest was made upon Shawn Williams by Detective Bobby Garrett and Detective Carr. At this time \$3000.00 dollars was confiscated from Mr. Williams. Mr. Williams was then taken to 8th St. Patrol, where false charges were initiated against him. Police report C107-D 37450 a fraudulent official document was filed by Det. Bobby Garrett. Shawn Williams was then threatened and handcuffed, then to be driven by Det. Garrett and Det. Carr to the residence located at 1500 Crossett, St. Louis, MO 63147 where the home was searched in front of minor

Children, in an attempt to locate more money. The detectives threatened imminent use of unlawful physical force upon Shawn Williams, as they substantially interfered with his liberty. The detectives attempted to dissuade Mr. Williams in making a report of victimization by law enforcement officers to a prosecuting agency. On September 30, 2008 the Asset Removal Unit had forfeited proceedings related to the seizure of Mr. Williams U.S. currency seized by Det. Bobby Garrett and Det. Carr under case no: PD-07X0282. The amount of return was only \$452.00, far lesser than the \$3000.00 dollars taken from Mr. Shawn Williams. Mr. Williams was robbed by servants of the public Det. Carr, Det. Bobby Garrett and The St. Louis Metropolitan Police Dept.

COUNT 02:

That BOBBY GARRETT in violation of V.A.M.S. § 575.080.1(3) committed the class B misdemeanor of Filing a False Report punishable upon conviction under V.A.M.S. § 558.011.1(6), in that on May 24, 2007 at the City of St. Louis, State of Missouri during a warrantless arrest of Shawn Williams gave false information upon a public record which then became an illegal document.

COUNT 03:

That BOBBY GARRETT in violation of V.A.M.S. § 575.060.1(1) committed the class B misdemeanor of Filing a False Declaration, punishable upon conviction under V.A.M.S. § 558.011.1(6) in that on May 24, 2007 in the City of St. Louis, State of Missouri gave false information

upon a public record to mislead the prosecuting agency. This illegal act brought about false charges upon Shawn Williams.

COUNT 04:

That BOBBY GARRETT in violation of V.A.M.S. § 575.110.1(1) committed the Class A Misdemeanor of Tampering with a Public Record punishable upon conviction under V.A.M.S. § 558.011.1(5), in that on May 24, 2007 in the City of St. Louis, State of Missouri, after initiating a warrantless arrest and robbing Shawn Williams, made false entries on a public document knowingly and willfully with intent to falsify.

COUNT 05:

That BOBBY GARRETT in violation of V.A.M.S. § 575.320.1(2)(5)(a)(b)(c)(d) committed the Class A Misdemeanor of Misconduct in Administration of Justice punishable upon conviction under V.A.M.S. § 558.011.1(5), that on May 24, 2007 in the City of St. Louis, State of Missouri, took U.S. currency from Shawn Williams, refuse to release him from custody and refuse to let him consult with counsel. Det. Bobby Garrett transferred Mr. Williams to another jurisdiction under false charges. These actions were done to conceal his illegal acts.

COUNT 06:

That BOBBY GARRETT in violation of V.A.M.S. § 570.030 1.(1)(5) committed the class C felony of Stealing, punishable upon conviction under V.A.M.S. § 558.01(3), that on about May 24, 2007, at the 8th N. Patrol in the City of St. Louis, State of Missouri, a law enforcement officer with the St. Louis Metropolitan Police Department seized \$3,000 in United States Currency from Shawn Williams. The money was "wrongfully taken" with the purpose to deprive Mr. Williams of his property by means of deceit. The money was derived from felony criminal activity by law enforcement officer Bobby Garrett.

COUNT 07:

That BOBBY GARRETT in violation of V.A.M.S. § 569.030 1. committed the class B felony of Robbery in the Second Degree, punishable upon conviction under V.A.M.S. § 558.011.1(2), that a law enforcement officer, Bobby Garrett on May 24, 2007, in the City of St. Louis, State of Missouri, "forcibly stole" \$3,000 in United States currency from Shawn Williams. Thereby committed robbery, when, in the course of stealing as the detective threatened to use physical force. The illegal act was done in front of surveillance cameras.

COUNT 8:

That The St. Louis Metropolitan Police Dept. and The Board of Police Commissioners are guilty of an offense under V.A.M.S. § 562.056.1(2)(3). Liability of Corporation. that on May 24, 2007 in the City of St. Louis, State of Missouri. that an agent(s) of the corporation acted purposely and knowingly while acting within the scope of their employment and in behalf of the corporation violated: V.A.M.S. § 575.020.1(2). § 575.080.1(3). § 575.060.1(1). § 575.110.1(1). § 575.320.1(2)(5)(a) (b)(c)(d). § 570.030.1(1)(A)5. § 569.030.1.

COUNT 9:

That The St. Louis Metropolitan Police Dept. and The Board of Police Commissioners are guilty of an offense under V.A.M.S. § 562.036 Accountability for Conduct that on May 24, 2007 in the City of St. Louis, State of Missouri. that agent(s) of the corporation acted purposely and knowingly while acting within the scope of their employment and in behalf of the corporation violated: V.A.M.S. § 575.020.1(2). § 575.080.1(3). § 575.060.1(1). § 575.110.1(1). § 575.320.1(2)(5)(a)(b)(c) (d). § 570.030.1(1)(A)5. § 569.030.1.

COUNT 10:

That The St. Louis Metropolitan Police Dept. and The

Board of Police Commissioners, is guilty of an offense under
V.A.M.S. § 562.041 Responsibility for the Conduct of Another
that on May 24, 2007 in the City of St. Louis, State of Missouri,
that agent(s) of the corporation acted purposely and knowingly while
acting within the scope of their employment and in behalf of the
corporation violated: V.A.M.S. § 575.020.1(2), § 575.080.1(3), § 575.
060.1(1), § 575.110.1(1), § 575.320.1(2)(5)(a)(b)(c)(d), § 570.030.1
41(N)5., § 569.030.1.

DEFENDANTS IDENTIFIED:

NAMES) Bobby Garrett, Det.

St. Louis Metropolitan Police Dept.
Ass of Removal Unit
1200 Clark Ave.
St. Louis, Mo. 63103

Board of Police Commissioners

VII. RELIEF

State briefly and exactly what you want the Court to do for you. Do not make legal arguments. (Note: If you are a **state** prisoner and you seek from this Court relief that affects the length or duration of your imprisonment, your case **must** be filed on a § 2254 form.)

To be released from this unlawful detention immediately
To be re-instated on this parole violation.

VIII. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☒ NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

I've suffered emotional and financial harm as a
result to this incident and rest. tuton in the amount
of \$2 million dollars would be appropriate.

IX. Do you claim that the wrongs alleged in the complaint are continuing to occur at the present time?

YES [☒] NO [☐]

Shannon Williams
Signature of attorney or pro se Plaintiff(s)

12-17-08
Date

SUBSEQUENT FILINGS

Certificate of Service

To file a motion, pleading or other paper, you must submit the original document to the Court Clerk. The original document must include a certificate of service which should be in the following form:

Certificate of Service	
<p>I hereby certify that a copy of the foregoing was mailed to <u>Clerk of Ct., U.S. D., St. Ct., Eastern</u> at <u>111 S. 10th St. 3.300, St. Louis, Mo.</u> [Opposing Party or Counsel] [Address] on <u>DEC 14</u>, 20<u>08</u>. [Date] <u>[Signature]</u> [Your Signature]</p>	

Any pleading or document received by the court that fails to include a certificate of service may be returned. In addition to filing the original document with the court, you must mail a copy of each document to all other parties, or if they have counsel, to their attorney(s).

Motions Filed By Other Parties

If you do not timely respond to a motion filed by another party, you may waive your right to challenge the subject matter of the motion. Applicable time periods are set forth in the Federal Rules of Civil Procedure and the Court's Local Rules.

Letters to the Court

It is improper to send letters directly to district or magistrate judges regarding cases pending before them. All correspondence should be forwarded to the Clerk of Court. Copies of correspondence should also be sent to all other parties, or if they have counsel, to their attorney(s).

MAILING

All correspondence, fees, legal documents, etc. should be mailed to the following address:

Clerk of Court
United States District Court
Eastern District of Missouri
111 S. Tenth Street, Suite 3.300
St. Louis, MO 63102